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City of Chattanooga

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Special Counsel

April 30, 2003

Ms. Sara Kyle, Chairman
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37243

**RE: *Petition of Tennessee American Water Company to
Change and Increase Certain Rates and Charges so as
to Permit it to Earn a Fair and Adequate Rate of
Return on its Property used and Useful in Furnishing
Water Service to its Customers, Docket No. 03-00118.***

Dear Chairman Kyle:

Enclosed for filing is the original and 13 copies of the City of Chattanooga's Second Set of Discovery Requests to Petitioner Tennessee-American Water Company.

Should you have any questions, please contact me.

Sincerely

Michael A. McMahan
Special Counsel

MAM/add

Enclosures

cc: Certificate of Service List

BEFORE THE TENNESSEE REGULATORY AUTHORITY

NASHVILLE, TENNESSEE

April 30, 2003

IN RE:)	DOCKET NO.
)	03-00118
PETITION OF TENNESSEE-AMERICAN)	
WATER COMPANY TO CHANGE AND)	
INCREASE CERTAIN RATES AND)	
CHARGES SO AS TO PERMIT IT TO)	
EARN A FAIR AND ADEQUATE RATE)	
OF RETURN ON ITS PROPERTY USED)	
AND USEFUL IN FURNISHING WATER)	
SERVICE TO ITS CUSTOMERS)	

**SECOND SET OF DISCOVERY REQUESTS TO PETITIONER
BY INTERVENOR CITY OF CHATTANOOGA**

**TO: Tennessee-American Water Company
c/o Dales Grimes, Esquire and
George H. Masterson, Esquire
Bass, Berry and Sims, PLC
315 Deaderick Street
AmSouth Center Suite #2700
Nashville, Tennessee 37238-3001**

Comes now the Intervenor, City of Chattanooga, Tennessee, pursuant to Rule 1220-1-2-.11 of the *Rules of Tennessee Regulatory Authority*, and propounds the following Second Set of Discovery Requests to Petitioner Tennessee-American Water Company.

1.) Provide any cost of services comparison for fire hydrants in the current case with any previous cost of services studies on fire hydrants within the past ten years.

ANSWER:

2.) In furtherance of Request No. 1, City's First Set, what methods were used to identify the fire usage for each month during the year? What person or persons made those estimates. Provide a copy of the pages of the monthly reports relating to fire usage for the twelve months ending July 31, 2002.

ANSWER:

TENNESSEE-AMERICAN WATER COMPANY

By: _____

STATE OF TENNESSEE)
COUNTY OF HAMILTON)

Sworn to and subscribed before me this _____ day of _____, 2003.

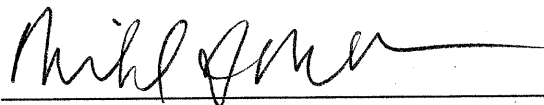
NOTARY PUBLIC AT LARGE

My Commission Expires: _____

Respectfully submitted,

CITY OF CHATTANOOGA, TENNESSEE
RANDALL L. NELSON, CITY ATTORNEY

BY: _____


MICHAEL McMAHAN, BPR #00810
PHILLIP A. NOBLETT, BPR #10074
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Chattanooga, Tennessee 37402
(423) 757-5338

(423) 756-0737 fax

CERTIFICATE OF SERVICE

This is to certify that I have this day served a true and correct copy of the above and foregoing pleading upon counsel of record by depositing a copy of same in the United States mail with adequate postage affixed thereto, addressed as follows:

Dale Grimes, Esquire
George H. Masterson, Esquire
BASS, BERRY and SIMS, PLC
315 Deaderick Street
AmSouth Center Suite #2700
Nashville, TN 37238-3001

Vance Broemel, Esquire
Shilina B. Chatterjee, Esquire
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Nashville, TN 37202

Henry Walker, Esquire
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414 Union Street, Suite 1600
Nashville, TN 37219

David C. Higney, Esquire
GRANT, KONVALINKA & HARRISON, P.C.
633 Chestnut Street, 9th Floor
Chattanooga, TN 37450

This 30th day of April, 2003.


MICHAEL A. McMAHAN